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Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

TAMMY A. GILL,

Plaintiff

v.

CAROLYN W. COLVIN, Acting  
Commissioner of Social Security,

Defendant.

) Case No: 2:15-cv-00553-JCM-CWH

)

)

) **JOINT STIPULATION FOR EXTENSION  
OF TIME TO FILE DEFENDANT'S  
CROSS-MOTION TO AFFIRM**

)

) **(Second Request)**

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)

The parties request to extend the time by sixty days from October 13, 2015, *nunc pro tunc*, to December 14, 2015 for Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (the Commissioner), to file her Cross-Motion To Affirm. This is the Commissioner's second request for an extension to file her Cross-Motion.<sup>1</sup>

<sup>1</sup> The Court granted the Commissioner an extension prior to filing her Answer because the agency component responsible for producing the Certified Administrative Record had not yet provided it. This occurred prior to briefing.

1 The extension is necessary because the previously assigned attorney for Defendant has  
2 unexpectedly been on leave due to a medical emergency. As a result of counsel's unexpected  
3 and extended absence, Defendant inadvertently failed to file her Cross-Motion by the  
4 October 13, 2015 deadline. After discovering this, Defendant has had to reassign this case to  
5 another attorney. Therefore, Defendant needs additional time for newly assigned counsel to take  
6 over the case, become familiar with the issues, and complete briefing.

7 Plaintiff has no objection. Defendant apologizes for any inconvenience resulting from the  
8 delay.

9 Respectfully submitted,

10 Date: November 16, 2015

By: /s/\* Marc V. Kalagian  
MARC V. KALAGIAN  
\*by email authorization on 11/16/15

12 Attorneys for Plaintiff

14 Date: November 13, 2015

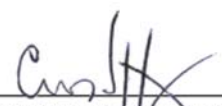
DANIEL G. BOGDEN  
United States Attorney  
BLAINE T. WELSH  
Chief, Civil Division

By: /s/ Susan L. Smith  
SUSAN L. SMITH  
Special Assistant United States Attorney

19 Attorneys for Defendant

21 IT IS SO ORDERED.

24 DATE: November 17, 2015

23  
24   
25 THE HONORABLE C. W. HOFFMAN, JR.  
26 United States Magistrate Judge

**DEFENDANT'S CERTIFICATE OF SERVICE**

I certify that I caused a copy of the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm to be served, via CM/ECF notification, on:

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Date: November 16, 2015

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Chief, Civil Division

By: /s/ Susan L. Smith  
SUSAN L. SMITH  
Special Assistant United States Attorney

Attorneys for Defendant